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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CASE NO. _____
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☐ Yes ☐ No

v.

Plaintiff(s),

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

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B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

Defendant No. 2

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

Defendant No. 3

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*select all that apply*)

☐ Federal question:

If checked complete section A.

☐ Diversity of citizenship:

If checked complete section B.

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *Attach additional pages if needed.*

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (*name*) _____, is a citizen of the
5 State of (*name*) _____.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (*name*) _____, is incorporated under
8 the laws of the State of (*name*) _____, and has its principal
9 place of business in the State of (*name*) _____.

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing*
11 *the same information for each additional plaintiff.)*

12 2. The Defendant(s)

13 a. If the defendant is an individual.

14 The defendant, (*name*) _____, is a citizen of the
15 State of (*name*) _____. Or is a citizen of
16 (*foreign nation*) _____.

17 b. If the defendant is a corporation.

18 The defendant, (*name*) _____, is incorporated under
19 the laws of the State of (*name*) _____, and has its principal
20 place of business in the State of (*name*) _____.

21 Or is incorporated under the laws of (*foreign nation*) _____,
22 and has its principal place of business in (*name*)_____.

23 *(If more than one defendant is named in the complaint, attach an additional page*
24 *providing the same information for each additional defendant.)*

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1 3. The Amount in Controversy.

2 The amount in controversy-the amount the plaintiff claims the defendant owes or the
3 amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*)
4 *Attach additional pages if needed:*

5
6
7
8 **III. STATEMENT OF CLAIM**

9 *Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as*
10 *possible the facts showing that each plaintiff is entitled to the damages or other relief sought.*
11 *State how each defendant was involved and what each defendant did that caused the plaintiff*
12 *harm or violated the plaintiff's rights, including the dates and places of that involvement or*
13 *conduct. If more than one claim is asserted, number each claim and write a short and plain*
14 *statement of each claim in a separate paragraph. Attach additional pages if needed.*

15 **IV. RELIEF**

16 *State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do*
17 *not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing*
18 *at the present time. Include the amounts of any actual damages claimed for the acts alleged and*
19 *the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,*
20 *and the reasons you claim you are entitled to actual or punitive money damages. Attach*
21 *additional pages if needed.*

22 **V. CERTIFICATION AND CLOSING**


23 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
24 knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
4 identified, will likely have evidentiary support after a reasonable opportunity for further
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
6 Rule 11.

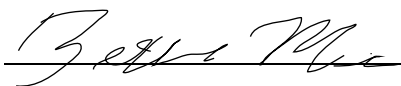
7 I agree to provide the Clerk's Office with any changes to my address where case-related
8 papers may be served. I understand that my failure to keep a current address on file with the
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing: _____

11 Signature of Plaintiff  _____

12 Printed Name of Plaintiff _____

13
14 Date of signing: _____

15 Signature of Plaintiff  _____

16 Printed Name of Plaintiff _____

17
18 Date of signing: _____

19 Signature of Plaintiff _____

20 Printed Name of Plaintiff _____

This is an action under the Washington Law against Discrimination (WLAD) to correct unlawful and discriminatory practices and to provide appropriate relief to Alexis Crawford and Bethany Mcauley, who have been adversely affected by such practices. Alexis and Bethany allege that defendant Tristan "The Night Girl" unlawfully discriminated against Alexis Crawford and her girlfriend Bethany Mcauley at her employment of Chevron because of Alexis and Bethany's disability of being addicts. Plaintiffs Alexis Crawford and Bethany Mcauley stopped at the Chevron on 4100 E Fourth plain Blvd Vancouver WA 98661 on Thursday December 22, 2022 around 1:30AM. Plaintiff Alexis Crawford moved her car from one pump to another and while she moved it plaintiff Bethany Mcauley was standing outside of the car watching her. Bethany Mcauley told Alexis that it looked like her wheel was about to fall off which scared Alexis because she felt it was a little whoobly while she were driving. Alexis parked at a pump and walked inside the Chevron and paid \$14 for some gas then walked back outside. Alexis pumped the gas and finished then walked to the trunk of her car and started looking for a size 17 lug nut to tighten her lug nuts on her tire to make sure it didn't fall off. Alexis had a bag full of different size lug nuts so she really had to dig inside the bag to search for the specific size that she needed. While she was looking for a size 17 she heard the cashier from inside tell her "you got five minutes to move your car or your loitering". When the plaintiffs Alexis and Bethany turned around they both seen the cashier that was inside now outside, smoking a cigarette, on her break. They didn't notice her there until she said something to them. The plaintiffs didn't know how long she was watching Alexis rummage through the bag but when Alexis turned around and seen her she was just standing there smoking a cigarette. Alexis turned around and told her she was trying to tighten her lug nuts on her tire. The defendant Tristan rudely replied and said "She's high off herion, meth or blues and I don't want any drug addicts on my property". Tristan claimed she had watched Alexis and she was high and "flailing" in her trunk. Alexis and Bethany were both so confused because they didn't understand why the cashier was accusing them of being high and why was she rushing them off the property because they were paying customers. Alexis told Tristan she didn't know what she was talking about and she was a customer so why did they have to hurry and only had five minutes? Alexis and Bethany weren't doing anything wrong except looking for a lug nut to tighten the tire before they drove off. It was crazy because no one was at the store and in the parking lot except Alexis, her girlfriend Bethany and The cashier Tristan. Alexis told Tristan that she didn't know what she was talking about and told her she didn't understand why she came outside and started messing with them for no reason. "We aren't doing anything except trying to tighten up these lug nuts" stated Bethany. Alexis then asked the cashier her name and stated she was going to call her boss and headquarters and the cashier replied with "I'm Tristan the night girl" than she said "I'm going to call the cops and tell them you are out here smoking dope in the parking lot". By then Alexis and Bethany were both confused because they weren't doing that and never did do that so they didn't understand why she would make up a lie like that. At that moment Tristan pulled out her cell phone and started to dial numbers. Bethany told Alexis "come on let's go this girl is messing with us for no reason". Alexis told Bethany "we didn't do anything wrong we shouldn't have to leave without making sure the tire is loose first". Bethany replied "NOW" so Alexis shut the trunk and got into the driver side and started the car. As soon as Alexis started the car, Tristan yelled "Oh where you going". Alexis put the car in drive and started driving off but noticed Tristan running behind them so Alexis gave it some gas and drove out of the Chevron parking lot and away from Tristan. They drove off the property and noticed she wasn't running behind them anymore and they had no idea why she chased them off the property. They were both shocked by the situation because the way she chased the car out of there you would have thought they did something wrong.

On December 22, 2022 the same night the incident occurred Plaintiff Alexis submitted a complaint to Chevron and the Washington State Human Rights Commission and told them there was camera footage of the incident and her girlfriend Bethany Mcauley was discriminated against too and also a witness. On December 29, 2022 Chevron sent Alexis an email stating "after reviewing video and talking to other employees that were there that night, we got a different story of what happened". Alexis and Bethany were confused because Bethany was the only witness there that night when Alexis and Tristan went back and fourth and Tristan chased them out of the parking lot. On January 17, 2023 for some reason the Commission told Alexis there was "insufficient evidence" to support her claim. Alexis called the commission and asked "How is camera footage and a witness insufficient evidence? What kind of evidence would be best for a claim like this?" And the Commission responded with "a cell phone video and/or something like a witness maybe". Alexis was confused at the Commission letter because Chevron had at least four different cameras outside and the Commission never bothered to call her girlfriend Bethany who experienced the discrimination too.

Alexis Crawford has endured emotional distress, insomnia, stress and depression as a direct result of Chevron discriminating her for a disability that she has battled with for 10+ years.

Bethany Mcauley has endured emotional distress, insomnia, anxiety, stress and depression as a direct result of Chevron discriminating her disability that she has battled with for 15 years.

First Cause of Action

(Violation of the Washington Law against Discrimination- Disability)

Tristan told Alexis and Bethany that she did not like drug addicts and they were not welcomed on HER property. Tristan kicked Alexis and Bethany off the property of Chevron after they just paid and pumped their gas. She gave them a five minute warning and told them she was going to call the police on them and make up a lie to try to get them in trouble for no reason. From what they could see she did call the police on them and than chased them off the property because she did not want drug addicts on HER property. Alexis and Bethany did not engage in drug activity on the property and did not have any drug paraphernalia on them.

☐ ☐